Office of the Secretary 555 S. Kansas Ave., 6th Floor Topeka, KS 66603



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Laura Howard, Acting Secretary

Laura Kelly, Governor

February 14, 2019

Shannon Christian, Director
Office of Child Care
Administration for Children and Families
U.S. Department of Health and Human Services
330 C Street SW
Washington, DC 20201

Dear Director Christian,

The Kansas Department for Children and Families recognizes that our CCDF State Plan for FFY 2019-2021 was approved on the condition that a corrective action plan (CAP) be developed and implemented for the following provisions. This CAP will bring Kansas into full compliance with the CCDBG Act of 2014 and the final rules as outlined by the Office of Child Care by September 30, 2019.

List of CAP categories from Column 1, Attachment 1 of the conditional approval letter issued by ACF include:

Eligibility Determination Processes (45 CFR 98.21) Health and Safety Requirements- Training (45 CFR 98.44)

Our CAPs include detailed information about how we will fully comply with the unmet requirements. Each CAP describes:

The plan question needing correction;

A description of the unmet requirement;

A target CAP completion date no later than September 30, 2019;

And detailed action steps needed to meet the requirement.

We understand from the conditional plan approval letter that if the CAPs fail to address all required elements, the CAP will be considered incomplete and will need to be revised and resubmitted to ACF. Upon completion of all the activities of the CAP, Kansas will submit a plan amendment to certify fulfillment of the requirements. Any requirement not implemented by September 30, 2019 will be subject to possible penalty pursuant to 98.92.

If you have any questions regarding this letter and our attached CAPs, please contact Karen Beckerman at 785-296-4717 or <a href="mailto:Karen.Beckerman@ks.gov">Karen.Beckerman@ks.gov</a>

Sincerely,

Latra Howard, Acting Secretary

Kansas Department for Children and Families

cc:

Karen Beckerman, CCDF State Administrator

Doris Hallford, Region VII Regional Program Manager, Office of Child Care

Prepare a CAP for each CAP category, as described in Column 1, Attachment 1 of the conditional approval letter issued by ACF (e.g., Disaster Preparedness CAP)

1) Plan	2) Unmet Requirement	3) Target	4) /	4) Action Steps Needed	Steps Needed to Meet Requirement	
Question			A) Activities	B) Individual	C) Timeline	D) Potential
List the plan	Describe the unmet	List the overall	rist up to 3 action steps	בואנ נווב	Tist tile state date	challenger to
question for	requirement	target CAP	needed to meet the	individual	AND end date for	challenges to
corrective		completion date	requirement	responsible for	each action step (no	meeting the action
action		(no later than		accomplishing	later than September	steps
		September 30,		each action step	30, 2019)	
		2019)				
<ul> <li>Eligibility</li> </ul>	The Office of Child Care	May 1, 2019	Step 1: Draft change	Sally Hargis,	Start date: 1-18-19	Task completed
Determination	policy guidance received		definition of temporary	Kansas	End date: 1-30-19	
Processes	states that the definition		change in state plan.	Department for		
(45CFR 98.21)	of temporary change			Children and		
	within our state plan			Families (DCF)		
3.3.1. – 12-	must not be limited to a		Step 2: Draft clarifying	Sally Hargis, DCF	Start date: 1-18-19	Task completed
Month	3-month time frame. The		language to add to		End date: 1-30-19	
Eligibility	need for a CAP		Kansas Economic and			
b) How does	(Corrective Action Plan)		Employment Services			
the Lead	was identified because		Manual (KEESM) 7640			
Agency define	the time-limited		Step 3: Review draft	Sally Hargis, DCF	Start date: 2-1-19	Possible revisions
"temporary	definition in our plan		changes with Economic	Karen	End date: 2-1-19	needed prior to
change?'	does not align with this		and Employment	Beckerman, DCF		implementation
	guidance.		Services (EES) Leadership			training and timely
			team.			approval due to
						competing

		implementation and CCDF State Plan Update.	Step 8: Full policy	implementation call.	policy change via	Step 7: Train staff on			,	team approval.	for agency executive	proposed policy change	Step 6: Circulate	implementation.	meeting for input on	Planning Team (IPT)	Implementation	policy changes to	Step 5: Take proposed	input.	Planning meeting for	changes to Policy	Step 4: Take proposed
			Sally Hargis, DCF			Sally Hargis, DCF							Sally Hargis, DCF						Sally Hargis, DCF				Sally Hargis
		End date: 5-1-19	Start date:5-1-19		End date: 4-25-19	Start date: 4-25-19						End date: 4-25-19	Start date: 4-1-19					End date: 2-13-19	Start Date: 2-13-19			End date: 2-7-19	Start date: 2-7-19
			None anticipated		1	None anticipated.	priorities.	competing	approval due to	training and timely	implementation	needed prior to	Possible revisions			training.	implementation	needed prior to	Possible revisions	training.	implementation	needed prior to	Possible revisions

Prepare a CAP for each CAP category, as described in Column 1, Attachment 1 of the conditional approval letter issued by ACF (e.g., Disaster Preparedness CAP)

1) Plan Question	2) Unmet Requirement	3) Target Completion Date		4) Action Steps Needed	Steps Needed to Meet Requirement
			A) Activities	B) Individual responsible	C) Timeline
List the plan	Describe the unmet	List the overall	List up to 5 action steps	List the	List the start date
corrective	ledanement	completion date	requirement	responsible for	each action step (no
action		(no later than		accomplishing	later than September
		September 30,		each action step	30, 2019)
• Eligibility	3.3.3 - Change reporting	August 1, 2019	Step 1: Draft income	Sally Hargis,	Start date: 1-18-19
Determination	during the 12-month	1	reporting requirement	Kansas	End date: 1-30-19
Processes	eligibility period		change to require that	Department for	
(45CFR 98.44)			families report income	Children and	
•	"The threshold for		changes when income	Families (DCF)	
	families to report income		exceeds 85% of State		
	changes does not ensure		Median Income for their		
	undue burden as		household size, and		
	required by the		corresponding Kansas		
	regulations. While we		Economic and		
	understand the state's		<b>Employment Services</b>		
	justification to not		Manual (KEESM)		
	require parents to figure		language for section		
	changes that cause them		9121.		
	to exceed 85% of State		Step 2: Review draft	Sally Hargis, DCF	Start date: 2-1-19
	Median Income (SMI),		changes with Economic	Karen	End date:
	the requirement to		and Employment	Beckerman, DCF	
	report changes of		Services (EES) Leadership		
	income at \$50/\$100		for approval.		

																														burden to families."	that could cause a	would create a situation
Approval	Agency Leadership	Step 7: Circulate for	implementation.	meeting for input on	Planning Team (IPT)	Implementation	draft changes to	Step 6: Take proposed	input	Planning meeting for	changes to Policy	Step 5: Take proposed	Enforcement System.	the Kansas Eligibility and	request can be done in	until related change	eligibility staff to use	contingency plan for	staff to develop a	Enforcement System	Kansas Eligibility and	Step 4: Work with	Enforcement System.	Kansas Eligibility and	related change to the	change request (CR) for	(KEES) staff to develop	Enforcement System	Kansas Eligibility and	Step 3: Work with		
		Sally Hargis, DCF						Sally Hargis, DCF				Sally Hargis, DCF										Sally Hargis, DCF								Sally Hargis, DCF		
	End date: 6-25-19	Start date: 6-1-19					End date: 5-8-19	Start date: 2-13-19			End date: 2-7-19	Start date: 2-7-19									End date: 4-30-19	Start date: 1-18-19							End date: 2-28-19	Start date: 1-18-19		
implementation training and timely	needed prior to	Possible revisions			training.	implementation	needed prior to	Possible revisions	training.	implementation	needed prior to	Possible revisions								priorities.	to competing	Possible delays due						priorities.	to competing	Possible delays due	priorities.	due to competing

						T			
				State Plan updated.	Step 9: Policy fully	policy change via implementation call.	Step 8: Train staff on		
					Sally Hargis, DCF		Sally Hargis, DCF		
				Ella agle: 0-T-TA	Start date: 8-1-19	End date: 6-25-19	Start date: 6-25-19		
					None anticipated		None anticipated	competing priorities.	approval due to

Proposed change to agency response in state plan 3.3.3 b):

Additional changes that may impact a family's eligibility during the 12-month period.

exceeds 85% of SMI for their household size. Describe: Beginning August 1, 2019, families must report within 10 days when the total gross earned and unearned income for their household

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1) Plan Question	2) Unmet Requirement	3) Target Completion Date	4),	4) Action Steps Needed	Steps Needed to Meet Requirement	
			A) Activities	B) Individual responsible	C) Timeline	D) Potential Challenges
List the plan	Describe the unmet	List the overall	List up to 5 action steps	List the	List the start date	Describe potential challenges to
corrective		completion date	requirement	responsible for	each action step (no	meeting the action
action		(no later than		accomplishing	later than September	steps
		September 30, 2019)		eacn action step	30, 2019)	
5.2.4	Provide the minimum	September 30,	Step 1- Notification.	Lori Steelman,	Health and Safety	None Anticipated.
Ongoing	number of required	2019	Kansas Department of	Kansas	annual hour	
Training	annual training hours on		Health and Environment	Department of	requirement will be	
Requirements.	health and safety topics		(KDHE) will inform	Health and	included in	
Provide the	for caregivers, teachers,		providers that of the	Environment	preorientation by	
minimum	and directors.		total 16 training hours	(KDHE)	April 1, 2019.	
number of			enquired annually, a			
annual			minimum of 4 hours		Providers receive	
training hours			(recommending 4-8)		written notification	
on health and			must be specific to		by April 30, 2019	
safety topics	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		health and safety. The			
for caregivers,			required minimum		Provider Health and	
teachers, and			number of health and		Safety annual hour	
directors			safety training hours will		requirement	
required.			be announced during a		instruction webinars	
			webinar. Information		will be completed by	
			will be included in the		May 30, 2019	
			provider pre-application			
			orientation as well as on			

							established.	Safety Training will be	minimum Health and	completion of the	Process to monitor	Step 3 Monitoring.	safety).	Area V (health and	Professionals, Content	Youth Development	Early Childhood and	Core Competencies for	the Kansas/Missouri	training and will refer to	as a health a safety	to identify what qualifies	Surveyors will be trained	Step 2 Training.								the KDHE webpage.	the "Provider" tab on
											KDHE	Lori Steelman,											KDHE	Lori Steelman,									
ongoing as needed.	Training will be	March 31, 2019.	requirement by	annual hour	Health and Safety	regarding provider	consultation	providing a	monitoring and	training on	complete initial	Surveyors will							March 31, 2019	requirement by	Safety annual hour	provider Health and	complete training on	Surveyors will	tab by May 30, 2019	Webpage/provider	Licensing	KDHE Child Care	will by posted to the	guidance document	requirement	Safety annual hour	A provider Health and
												None Anticipated.												None Anticipated.									

transcripts must include	certificates and	Kansas that all training	and Child Care Aware of	Opportunities (KCCTO)	Child Care Training	DCF will notify Kansas	Step 5	within 60 days.	safety hours to KDHE	completed health and	documentation of	instructed to send	met." Providers will be	directors has not been	caregivers, teachers, and	health and safety for	annual training hours on	minimum number of	Reauthorization Bill, the	stating, "Per the 2014	Notice of Survey Findings	Consultation on the	will include a	required, the surveyor	documented on file as	training hours	health and safety	have a minimum of 4	If a provider does not	Needed.	Complete Training if	Step 4 Opportunity to
			Families (DCF)	Children and	Department for	Kansas	Judy Golden,																								KDHE	Lori Steelman,
							March 31, 2019																					May 31, 2019.	Survey Findings by	inspection Notice of	noted on the provider	A consultation will be
							None anticipated.																			providers if needed.	resource options to	provide training	Surveyors will	resources.	of training	Provider unaware

			-																													
agreement will be	60 days the DCF provider	not been received within	training certificates have	and if the requested	follow-up the provider	enrollment staff will	DCF child care provider	follow up.	forwarded to DCF for	information will be	(DCF), the provider	Children and Families	Kansas Department for	agreement with the	provider has an	business days and the	training hours within 5	with proof of completed	report back to KDHE	If the provider does not	Steps if Needed.	Step 6 Corrective Action	requirements.	reauthorization	safety), meeting	Area V (health and	Professionals, Content	Youth Development	Early Childhood and	Core Competencies for	according to the KS MO	identification of courses
																			DCF	Lisa Jeanneret,	KDHE	Lori Steelman,										
															2019.	beginning July 31,	hour requirement	and safety minimum	not met the health	inspected that have	to DCF of all providers	KDHE submit a report										
															providers.	needed to	resource options if	provide training	Enrollment staff will	resources. DCF	of training	Provider unaware										

	requirement.	exempt from this	out of home care are	home care and relative	and staff. Relative in-	License Exempt Center	staff and	Child Care providers and	staff and Licensed Family	Center Directors and	care for both Licensed	training by category of	health and safety	number of hours of	to reflect the minimum	Revise CCDF State plan	Step 7	terminated with a 30- day notice.
																DCF	Lisa Jeanneret,	
																	By August 1, 2019	
																	None anticipated.	

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1) Plan Question	2) Unmet Requirement	3) Target Completion Date	4) /	Action Steps Needed	4) Action Steps Needed to Meet Requirement	
			A) Activities	B) Individual responsible	C) Timeline	D) Potential Challenges
List the plan	Describe the unmet	List the overall	List up to 5 action steps	List the individual	List the start date AND end date for	Describe potential challenges to
corrective	•	completion date	requirement	responsible for	each action step (no	meeting the action
action		(no later than September 30,		accomplishing each action step	later than September 30, 2019)	steps
		2019)				
5.2.5	Describe the ongoing	September 30,	Step 1 The Kansas	Lori Steelman,	Health and Safety	None anticipated.
Describe the	required health and	2019	Department of Health	Kansas	annual hour	
ongoing	safety training by		and Environment (KDHE)	Department of	requirement will be	
health and	category of care.		will provide guidance to	Health and	included in	
safety			providers that of the	Environment	preorientation by	
training for			total training hours	(KDHE)	April 1, 2019.	
CCDF			required annually, a			
providers by			minimum of 4 hours		Providers receive	
category of			(recommending 4-8)		written notification by	
care (i.e.,			must be specific to		April 30, 2019	
center, FCC,			health and safety.			
in-home)			Approved Health a safety		Provider Health and	
and			training will refer to the		Safety annual hour	
licensing			Kansas/Missouri Core		requirement	
status (i.e.,			Competencies for Early		instruction webinars	
licensed,			Childhood and Youth		will be completed by	
licensed			Development		May 30, 2019	
exempt)			Professionals, Content			
			Area V (health and			

Step 3 The Kansas Department for Children and Families (DCF) will notify Licensed exempt	Step 2 Training. Licensing surveyors will be trained to identify what qualifies as a health a safety training and will refer to the Kansas/Missouri Core Competencies for Early Childhood and Youth Development Professionals, Content Area V (health and safety).	safety). This requirement will be the same for Licensed Center Directors and staff; Licensed Family Child Care Providers and staff; and License-Exempt Directors and staff receiving CCDF funding.
Lisa Jeanneret, Kansas Department for	Lori Steelman, KDHE	
	Surveyors will complete training on provider Health and Safety annual hour requirement by March 31, 2019	A provider Health and Safety annual hour requirement guidance document will by posted to the KDHE Child Care Licensing Webpage/provider tab by May 30, 2019
None anticipated.	None anticipated.	

												Α										-								-		
													***************************************																			
and	Care providers and staff	Licensed Family Child	Directors and staff and	both Licensed Center	by category of care for	health and safety training	number of hours of	reflect the minimum	Revise CCDF State plan to	Step 5	-	requirements.	reauthorization	safety), meeting	Area V (health and	Professionals, Content	Youth Development	Early Childhood and	Core Competencies for	according to the KS MO	identification of courses	transcripts must include	certificates and	Kansas that all training	and Child Care Aware of	Opportunities (KCCTO)	Child Care Training	DCF will notify Kansas	Step 4	for this requirement.	requirement and monitor	providers of this new
									DCF	Lisa Jeanneret,																			Judy Golden, DCF		Families (DCF)	Children and
										By August 1, 2019																			March 31, 2019			
										None anticipated.																			None anticipated.			

				and st home out of exemp requir	Licens
				and staff. Relative inhome care and relative out of home care are exempt from this requirement.	e Exempt Center